

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

UNITED STATES, *et al.*,

*Plaintiffs,*

vs.

GOOGLE LLC,

*Defendant.*

No. 1:23-cv-00108-LMB-JFA

**DECLARATION OF DAN TAYLOR  
IN SUPPORT OF DEFENDANT GOOGLE LLC'S  
MOTION TO SEAL CONFIDENTIAL DOCUMENTS AND TESTIMONY**

I, Dan Taylor, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a Vice President of Global Ads at Google LLC ("Google"). I have been employed by Google since August 2006 and have held my current position since May 2021. I submit this Declaration in support of Google's Motion to Seal Confidential Documents and Testimony.

2. Based on my work at Google, I have personal knowledge of the company's practices and procedures for maintaining the confidentiality of its strategic, business, and financial information, as well as the impact of publicly disclosing such information. The contents of this Declaration are true and correct to the best of my knowledge, information, and belief, and are based on Google's policies and practices as they relate to the treatment of confidential information, the materials that were provided to me and reviewed by me, and/or informed by conversations with other knowledgeable employees of Google. If called upon as a witness in this action, I could and would testify competently thereto.

3. Google follows a strict practice that requires confidential treatment of its product and customer data; internal strategic business plans; non-public financial information; and internal business analyses of customer spending, revenue, pricing, industry conditions, and opportunities. In my experience and to the best of my knowledge, in order to protect itself from competitive harm, Google takes significant

precautions to ensure that this information is not made public, and does not disclose documents or information of this nature outside of the company, with the exception of certain documents that Google shares with partners or fiduciaries, subject to further confidentiality requirements.

4. I have reviewed the trial exhibits identified below, and I believe that the sealing (or redaction, when specified) of those exhibits is necessary to protect Google's trade secrets and proprietary information.

5. I have reviewed RDTX888, RDTX889, RDTX930, and RDTX931 along with Google's proposed redactions. Google's proposed redactions encompass recent or current financial analysis, including specific spending and impression data for various types of AdX and DFP transactions. Neither Google nor Alphabet discloses this information in public SEC filings at the granular level represented by these exhibits. Public disclosure of the information contained in these exhibits would provide Google's competitors with unfair access to Google's financial analyses, trajectory, and priorities, and could harm Google's competitive position in the marketplace. For this reason, Google strictly maintains the confidentiality of this competitively sensitive information.

6. I have reviewed RDTX485, RDTX575, RDTX615, RDTX616, RDTX841, and RDTX869. These exhibits contain recent or current strategy discussions and analyses related to Google's products, including discussions and analyses concerning product sales approach and pricing to specific customers, customer trends and market conditions, internal Google infrastructure usage and expenditures, buyer outreach, product alterations and modifications, strategic considerations and trade-off analyses, and product development. Disclosure of this information could allow competitors to predict Google's future product decisions, and could harm Google's competitive position in the marketplace. For this reason, Google strictly maintains the confidentiality of this competitively sensitive information.

7. I have reviewed RDTX595 along with Google's proposed redactions. These redactions encompass recent or current strategy discussions and analyses related to Google's products, including discussions and analyses concerning internal Google infrastructure and expenditures, product alterations and modifications, and product development. Disclosure of this information could allow competitors to

predict Google's future product decisions, and could harm Google's competitive position in the marketplace. For this reason, Google strictly maintains the confidentiality of this competitively sensitive information.

8. I have reviewed RDTX476, RDTX620, RDTX707 and PRX071, alongside Google's proposed redactions. These redactions contain detailed customer information, including recent or current pricing terms as well as recent or current commercially sensitive non-pricing contractual terms and arrangements and customer spending and account information. Disclosure of this information would provide Google's competitors with unfair access to Google's future business strategy and confidential customer terms and data and could harm Google's customers as well as Google's competitive position in the marketplace. For this reason, Google strictly maintains the confidentiality of this competitively sensitive information.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 4, 2025, in New York, NY

Signed by:

*Dan Taylor*

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Dan Taylor, Vice President Google LLC